

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SONTAYA A. BELTON,

Plaintiff,

-against-

JB HUNT TRANSPORT INC and RICHARD RIOS,

Defendants.
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Docket No.: 1:22-cv-05002

NOTICE OF REMOVAL

Removed from the
Supreme Court, Bronx
County Index No.: 801207/2022E

The defendants, **J.B HUNT TRANSPORT, INC. s/h/a JB HUNT TRANSPORT INC and RICHARD RIOS**, remove this action from the Supreme Court, Bronx County to the United States District Court for the Southern District of New York.

1. The plaintiff commenced this action against **J.B HUNT TRANSPORT, INC. s/h/a JB HUNT TRANSPORT INC and RICHARD RIO** in the Supreme Court of the State of New York, Bronx County. A copy of the complaint is attached as **Exhibit “A”**.

2. The plaintiff, Sontaya A. Belton, is a citizen of the State of New York, Bronx County and was a citizen of the State of New York when this action was started in state court.

3. The defendants are citizens of a state other than the State of New York and were citizens of a state other than the State of New York when this action was started in state court.

a.) J.B. Hunt Transport, Inc. is (and was) a corporation incorporated in the State of Georgia with its principal place in business in Lowell, Arkansas.

b.) Richard Rios, upon information and belief, resides and has been residing at 52 Vadnais Street, Springfield, Massachusetts 01104 when this action was started in state court. Richard Rios is a citizen of the State of Massachusetts, Hampden County.

4. J.B. Hunt Transport, Inc. was served on or about January 31, 2022.

5. In a Response to a request for an Ad Damnum, received on May 19, 2022, plaintiff indicated that the damages have exceeded \$75,000 (specifically \$10,000,000).

6. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started—is between citizens of different states and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

7. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the District Courts of the United States have original jurisdiction that is brought in a state court.

8. All defendants join in the removal of this action to this Court.

Dated: New York, New York
June 15, 2022

RAWLE & HENDERSON LLP
Attorneys for Defendants
J.B. HUNT TRANSPORT, INC.
s/h/a JB HUNT TRANSPORT INC
and RICHARD RIOS



By: _____

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